

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13  
  
TRACIE UPCHURCH : 11-17065AMC

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

McCullough Eisenberg, L.L.C. has filed a **POST-CONFIRMATION MOTION** with the court to **MODIFY CHAPTER 13 PLAN**.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **July 27, 2014** you and your attorney must do all of the following:

(a) file an answer explaining your position at Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, PA 19107-4299.

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to Movant's attorney:  
Stuart A. Eisenberg, Esquire  
MCCULLOUGH EISENBERG, L.L.C.  
65 West Street Road, Suite A-105, Warminster, PA 18974  
Phone: (215)-957-6411; Fax: (215) 957-9140

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the **Honorable ASHELY CHAN** on **AUGUST 9, 2016**, at **10:00 AM** in Courtroom **#5**, Robert

N.C. Nix Building, 900 Market Street, Philadelphia, PA 19107-4299

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an Answer.

Date: 07/15/16